

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

In Re:

Case No. 8:17-bk-06834-CPM

ROGER DALE BRUNNER and  
MARY ANNE BRUNNER  
Debtors.

Chapter 13 Case

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**MOTION TO EMPLOY SPECIAL COUNSEL**

The Debtors, ROGER DALE BRUNNER and MARY ANNE BRUNNER, by and through their undersigned counsel, hereby file this Motion to Employ Special Counsel, and states:

1. The Debtor filed for relief under Chapter 13 the United States Bankruptcy Code on August 2, 2017.
2. The Debtor employed G. DONALD GOLDEN, ESQUIRE, as their bankruptcy counsel.
3. The Debtors, ROGER DALE BRUNNER and MARY ANNE BRUNNER, suffered collections abuses by CLEARSPRINGS, BAYVIEW AND ALTA REO prior to the filing of their Chapter 13 case.
4. The Debtors have hired THE GOLDEN LAW GROUP and DANN LAW to prosecute a civil case against the Defendants, CLEARSPRINGS, BAYVIEW AND ALTA REO, individually. The lead attorney of the litigation is G. DONALD GOLDEN ESQUIRE, of THE GOLDEN LAW GROUP.
5. The Debtors signed a contingency fee retainer agreement for attorney fees and costs.
6. The undersigned counsel for the Debtors, G. Donald Golden, Esquire, believes that the special employment of this attorney would be in the best interest of Estate as the proceeds from the Debtors have pledged the proceeds from the claims to their Chapter 13 Plan.

**WHEREFORE**, the Debtors by and through their undersigned counsel move this Honorable Court to employ special counsel and pay them according to their fee retainer agreement.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing **Motion to Employ Special Counsel** has been provided to the following listed below; on this 14th day of February, 2018.

Sent via first class U.S. mail, postage prepaid, or electronically, to:

Jon M. Waage, Chapter 13 Trustee

Roger & Mary Anne Brunner, Debtors  
3015 Gem Luster Court  
Valrico, Florida, 33594

/s/ G. Donald Golden  
G. DONALD GOLDEN, ESQUIRE  
Florida Bar No. 0137080  
E-Mail: [don@brandonlawyer.com](mailto:don@brandonlawyer.com)  
KELLY C. BURKE, ESQUIRE  
Florida Bar No. 0123506  
E-Mail: [kelly@brandonlawyer.com](mailto:kelly@brandonlawyer.com)  
THE GOLDEN LAW GROUP  
808-A Oakfield Drive  
Brandon, Florida 33511  
Telephone: (813) 413-8700  
Facsimile: (813) 413-8701  
Attorneys for Debtor(s)

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AFFIDAVIT OF PROPOSED ATTORNEY

STATE OF FLORIDA  
COUNTY OF HILLSBOROUGH

I, G. DONALD GOLDEN, of THE GOLDEN LAW GROUP, hereby state under oath:

1. That I am an attorney duly admitted to practice in the State of Florida.
2. That I maintain an office at 808 Oakfield Drive, Suite A, Brandon, Florida 33511.
3. The undersigned attorney represents the Debtors in their pending Chapter 13 bankruptcy case.
4. The Debtors also retained my firm to file FDCPA, FCCPA and TCPA claims.
5. I neither hold nor represent any interest adverse to the bankruptcy action.
6. My law firm neither holds nor represents any interests adverse to the bankruptcy estate.

  
G. DONALD GOLDEN

Date: Feb. 13, 2018

SWORN TO and SUBSCRIBED before me this 13<sup>th</sup> day of Feb, 2018,  
by G. DONALD GOLDEN, ESQUIRE, who is personally known to me and who did take an  
oath.

  
NOTARY PUBLIC, STATE OF FLORIDA

